

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**[PROPOSED] ORDER GRANTING NON-PARTY THE WALT DISNEY COMPANY’S
MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), non-party The Walt Disney Company (“TWDC”) filed a Motion to Seal (“Motion”), which seeks to seal portions of the deposition testimony of Jeremy Helfand. Having considered the Motion and accompanying memorandum of law, as well as any opposition thereto, this Court finds that (i) sufficient notice of the Motion was given; (ii) TWDC’s interest in protecting its sensitive, confidential, business information outweighs the public’s right of access; (iii) a procedure other than sealing is insufficient to protect TWDC’s interest; and (iv) TWDC seeks to seal only as much as is necessary to protect its interest.

Accordingly, it is hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the portions of the deposition testimony of Jeremy Helfand specified in the memorandum of law accompanying the Motion shall remain UNDER SEAL until further order of this Court.

SO ORDERED on this ___ day of _____, 2024.

United States District Judge